

EDWARD H. KUBO, JR. #2499
 United States Attorney
 District of Hawaii

FLORENCE T. NAKAKUNI #2286
 Chief, Narcotics Section

CHRIS A. THOMAS #3514
 Assistant U.S. Attorney
 Room 6-100, PJKK Federal Building
 300 Ala Moana Boulevard
 Honolulu, Hawaii 96850
 Telephone: (808) 541-2850
 Facsimile: (808) 541-2958
 E-mail: Chris.Thomas@usdoj.gov

Attorneys for Plaintiff
 UNITED STATES OF AMERICA

FILED IN THE
 UNITED STATES DISTRICT COURT
 DISTRICT OF HAWAII

OCT 08 2003

at 2 o'clock and 50 min. M.
 WALTER A.Y.H. CHINN, CLERK

SEALED
 BY ORDER OF THE COURT

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. CR 03-00494 SOM
)	
Plaintiff,)	INDICTMENT
)	
vs.)	[21 U.S.C. §§ 841(a)(1),
BRANDON CHANG,	(01)) (b)(1)(A), 843(b) and 846,
JACOB LYMAN,	(02)) 18 U.S.C. § 2]
SHANE TOM,	(03))
KYLE UEMURA,	(04))
WILLIAM TOTTEN,	(05))
JASEN ANTONIO)
a.k.a "Fluff,"	(06))
DONALD E. RAMIL, JR.,	(07))
DANIEL GAGNON)
a.k.a. "Pocho,"	(08))
SCHANTEL HALL,	(09))
JOHN JOSE,	(10))
JOSEPH REARDON,	(11))
KEANU GALENG,	(12))
CLEMENT SANTIAGO,	(13))
RAYLYNNE MATA,	(14))
)	
Defendants.)	
)	

INDICTMENT

COUNT 1:

The Grand Jury charges that:

From on or about May 1, 2003, to and including September 30, 2003, in the District of Hawaii, and elsewhere,

BRANDON CHANG, JACOB LYMAN,
SHANE TOM, KYLE UEMURA,
WILLIAM TOTTEN, JASEN ANTONIO a.k.a "Fluff,"
DONALD E. RAMIL, JR.,
DANIEL GAGNON a.k.a. "Pocho,",
SCHANTEL HALL, JOHN JOSE,
JOSEPH REARDON and KEANU GALENG,

defendants herein, did willfully and unlawfully conspire together with each other and others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute, fifty (50) grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

It was the object of the aforesaid conspiracy to possess methamphetamine for distribution in Hawaii.

WAYS AND MEANS OF ACCOMPLISHING THE CONSPIRACY

1. WILLIAM TOTTEN, and others, arranged for quantities of methamphetamine to be transported to Honolulu, Hawaii for distribution.

2. The methamphetamine was distributed to JACOB LYMAN, SHANE TOM, KYLE UEMURA, and BRANDON CHANG, among others.

3. BRANDON CHANG would arrange to have methamphetamine shipped to the Big Island of Hawaii with the help of DONALD E. RAMIL, JR., DANIEL DAVID GAGNON a.k.a. "Pocho," and SCHANTEL HALL.

4. JASEN ANTONIO a.k.a "Fluff," and BRANDON CHANG distributed the methamphetamine on the Big Island of Hawaii.

5. JACOB LYMAN distributed methamphetamine to JOHN JOSE, JOSEPH REARDON and KEANU GALENG for further distribution on the island of Oahu.

6. The co-conspirators used cellular telephones to plan, coordinate and execute their agreement to distribute methamphetamine.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, the defendants performed overt acts in the District of Hawaii and elsewhere which include, but are not limited to, the following:

1. On or about May 14, 2003, JACOB LYMAN telephoned BRANDON CHANG and advised him that a quantity of methamphetamine was being brought into Hawaii by his friend, referring to WILLIAM TOTTEN, and that BRANDON CHANG would receive a portion of the shipment.

2. On or about May 16, 2003, BRANDON CHANG distributed a quantity of methamphetamine to RAYLYNNE MATA.

3. On or about May 17, 2003, BRANDON CHANG discussed with JASEN ANTONIO the distribution of methamphetamine.

4. On or about May 22, 2003, JACOB LYMAN and BRANDON CHANG discuss on the telephone an incoming shipment of methamphetamine and that the price would be \$21,000 per pound.

5. On or about May 22, 2003, BRANDON CHANG telephoned DONALD E. RAMIL, JR. to discuss the method of shipping the methamphetamine from Oahu to the Big Island of Hawaii.

6. On or about May 22, 2003, JACOB LYMAN informed BRANDON CHANG that he would be receiving five (5) pounds of methamphetamine from JACOB LYMAN and that BRANDON CHANG would also be receiving two (2) pounds of methamphetamine from KYLE UEMURA who was getting it from SHANE TOM.

7. On or about May 23, 2003, KYLE UEMURA telephoned BRANDON CHANG and confirmed the shipment of the methamphetamine from Oahu to the Big Island of Hawaii.

8. On or about May 23, 2003, KYLE UEMURA and DANIEL GAGNON shipped approximately 2 pounds of methamphetamine from Oahu to BRANDON CHANG on the Big Island of Hawaii.

9. On or about May 27, 2003, BRANDON CHANG telephoned JASEN ANTONIO and informed him that an amount of methamphetamine was about to arrive.

10. On or about May 27, 2003, BRANDON CHANG telephoned CLEMENT SANTIAGO and informed him that an amount of methamphetamine was about to arrive.

11. On or about May 27, 2003, DONALD E. RAMIL, JR., shipped approximately five (5) pounds of methamphetamine from Oahu to BRANDON CHANG on the Big Island of Hawaii.

12. On or about May 27, 2003, the telephone number for the telephone used by SCHANTEL HALL was listed as the contact number for the parcel containing the five (5) pounds of methamphetamine that was shipped from Oahu to BRANDON CHANG on the Big Island of Hawaii.

13. On or about May 28, 2003, approximately two (2) pounds of methamphetamine was seized at the Young Brothers terminal at Kawaihae Harbor on the Big Island of Hawaii.

14. On or about May 28, 2003, BRANDON CHANG and JASEN ANTONIO arrived at the Young Brothers terminal at Kawaihae Harbor on the Big Island of Hawaii and attempted to pick up the parcel that contained the two (2) pounds of methamphetamine that was seized.

15. On or about May 30, 2003, approximately five (5) pounds of methamphetamine was seized at the Young Brothers terminal at Kawaihae Harbor on the Big Island of Hawaii.

16. On or about July 14, 2003, WILLIAM TOTTEN informed JACOB LYMAN about an upcoming shipment of a quantity of methamphetamine

17. On or about July 17, 2003, JACOB LYMAN and JOSEPH REARDON discuss a sale of a quantity of methamphetamine.

18. On or about July 31, 2003, JACOB LYMAN and JOHN JOSE discuss a sale of a quantity of methamphetamine.

19. On or about August 26, 2003, JACOB LYMAN discusses on the telephone a sale of a quantity of methamphetamine to KEANU GALENG.

20. On or about August 29, 2003, JACOB LYMAN and JOSEPH REARDON discuss the distribution of a quantity of methamphetamine.

21. On or about September 5, 2003, JACOB LYMAN and JOHN JOSE discuss a sale of a quantity of methamphetamine.

All in violation of Title 21, United States Code, Section 846.

COUNT 2:

The Grand Jury further charges that:

From on or about May 1, 2003, to and including August 31, 2003, in the District of Hawaii, and elsewhere,

**BRANDON CHANG, JACOB LYMAN,
SHANE TOM, KYLE UEMURA,
WILLIAM TOTTEN, JASEN ANTONIO a.k.a "Fluff,"
DONALD E. RAMIL, JR.,
DANIEL GAGNON a.k.a. "Pocho,",
SCHANTEL HALL,**

did knowingly and intentionally possess with intent to distribute, 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18 United States Code, Section 2.

COUNT 3:

The Grand Jury further charges that:

On or about May 14, 2003, within the District of Hawaii, **JACOB LYMAN**, used and caused to be used a communications facility, that is a telephone, in causing or facilitating the commission of a conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 4:

The Grand Jury further charges that:

On or about May 14, 2003, within the District of Hawaii, **BRANDON CHANG**, used and caused to be used a communications facility, that is a telephone, in causing or facilitating the commission of a conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled

substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 5:

The Grand Jury further charges that:

On or about May 16, 2003, within the District of Hawaii, **RAYLYNNE MATA**, used and caused to be used a communications facility, that is a telephone, in causing or facilitating the commission of a conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 6:

The Grand Jury further charges that:

On or about May 17, 2003, within the District of Hawaii, **JASEN ANTONIO, a.k.a. "Fluff"**, used and caused to be used a communications facility, that is a telephone, in causing or facilitating the commission of a conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code,
Section 843(b).

COUNT 7:

The Grand Jury further charges that:

On or about May 22, 2003, within the District of Hawaii, **DONALD R. RAMIL, JR.**, used and caused to be used a communications facility, that is a telephone, in causing or facilitating the commission of a conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code,
Section 843(b).

COUNT 8:

The Grand Jury further charges that:

On or about May 23, 2003, within the District of Hawaii, **KYLE UEMURA**, used and caused to be used a communications facility, that is a telephone, in causing or facilitating the commission of a conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code,
Section 843(b).

COUNT 9:

The Grand Jury further charges that:

On or about May 23, 2003, within the District of Hawaii, **DANIEL GAGNON, a.k.a. "Pocho"**, used and caused to be used a communications facility, that is a telephone, in causing or facilitating the commission of a conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, a felony under Titles 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 10:

The Grand Jury further charges that:

On or about May 27, 2003, within the District of Hawaii, **CLEMENT SANTIAGO**, used and caused to be used a communications facility, that is a telephone, in causing or facilitating the commission of a conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, a felony under Titles 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 11:

The Grand Jury further charges that:

On or about August 29, 2003, within the District of Hawaii, **JOSEPH REARDON**, used and caused to be used a communications facility, that is a telephone, in causing or facilitating the commission of a conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, a felony under Titles 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 12:

The Grand Jury further charges that:

On or about September 2, 2003, within the District of Hawaii, **WILLIAM TOTTEN**, used and caused to be used a communications facility, that is a telephone, in causing or facilitating the commission of a conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, a felony under Titles 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 13:

The Grand Jury further charges that:

On or about August 26, 2003, within the District of Hawaii, **KEANU GALENG**, used and caused to be used a communications facility, that is a telephone, in causing or facilitating the commission of a conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, a felony under Titles 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 14:

The Grand Jury further charges that:

On or about August 29, 2003, within the District of Hawaii, **JOHN JOSE**, used and caused to be used a communications facility, that is a telephone, in causing or facilitating the commission of a conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, a felony under Titles 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

//

//

//

//

DATED: October 8, 2003 at Honolulu, Hawaii.

A TRUE BILL

151

FOREPERSON, GRAND JURY

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

Jenny L. Halealei
FLORENCE T. NAKAKUNI

Chief, Narcotics Section

Chris A. Thomas
CHRIS A. THOMAS

Assistant U.S. Attorney

U.S. v. Brandon Chang, et al.

"Indictment"

Cr. No.